



485 SEVENTH AVENUE • SUITE 1000 • NEW YORK • NEW YORK • 10018

TELEPHONE  
(212) 239-4340

April 15, 2010

FAX  
(212) 239-4310

**VIA HAND DELIVERY**

WEB  
WWW.LAWSSB.COM

Honorable Marilyn D. Go  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East, Room 1214S  
Brooklyn, New York 11201

RE: *Weiss, et al. v. National Westminster Bank, PLC* – Case No. CV – 05-4622;  
*Applebaum, et al. v. National Westminster Bank, PLC* – Case No. CV – 07-916

Dear Magistrate Judge Go:

We write on behalf of all Plaintiffs to request that Your Honor approve and sign the enclosed Request for Permission to Take Evidence in the United Kingdom Pursuant to the 1970 Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters (the “Hague Convention Request” or “Request”). Based on a review of the documents produced by defendant National Westminster Bank, PLC (“NatWest” or “Defendant”) pertaining to Interpal and other customers Plaintiffs allege to be affiliated with HAMAS, as well as deposition testimony taken thus far, Plaintiffs believe that nine former NatWest employees – Amanda Holt, Neil Trantum, Sonia Gayle, Richard Gossage, Terry Woodley, David Swanney, Gerald Matthews, Ben Norrie, and Charlotte McComas – possess relevant information regarding Interpal, a former NatWest customer. Accordingly, Plaintiffs believe that the enclosed Hague Convention Request will enable us to obtain important, but otherwise unavailable testimony. Defendant’s counsel have reviewed and provided their consent to the attached Request.

The Hague Convention Request directs the Senior Master of the High Court of Judicature, Queen’s Bench Division, to allow Plaintiffs to depose Amanda Holt, Neil Trantum, Sonia Gayle, Richard Gossage, Terry Woodley, David Swanney, Gerald Matthews, Ben Norrie, and Charlotte McComas in accordance with the procedures described in the Request, subject to the provisions of the confidentiality orders in these cases. If Your Honor signs this Request, we will promptly pursue the specified procedures for this Request to be processed in the United Kingdom.

SHALOV STONE BONNER & ROCCO LLP

A T T O R N E Y S A T L A W

Honorable Marilyn D. Go  
April 15, 2010  
Page 2

Thank you for your consideration of these matters.

Respectfully submitted,



James P. Bonner

cc: All Counsel of Record (w/attachment)